

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re:

CHARLES MARTIN

Debtor

Case 20-18680-MCR  
Chapter 7

\* \* \* \* \*

**TRUSTEE'S REPLY TO DEBTOR'S RESPONSE AND OPPOSITION  
TO THE TRUSTEE'S MOTION TO SELL REAL PROPERTY LOCATED AT  
5209 Beaufort Avenue, Baltimore, Maryland 21215**

Cheryl E. Rose, the Chapter 7 Trustee of the above captioned bankruptcy estate, by and through her counsel, Cheryl E. Rose, Esq. and Rose & Associates, LLC, responds to the Debtor's Response and Opposition to the Trustee's Motion to Sell Real Property Located at **5209 Beaufort Avenue**, Baltimore, Maryland 21215 (hereinafter "Response and Opposition") and states as follows:

1. Initially, the Debtor is objecting to a sale of real property located at **5209 Beaufort Avenue**. The Motion to Sell before this Court is for real property located at **3910 Hayward Avenue**, Baltimore, Maryland 21215 (Docket 522).

2. It is unclear what grounds the Debtor is objecting to in his Response and Opposition as an Order was entered in this case on October 29, 2021 (Docket 361) authorizing the Trustee to operate the Debtor's limited liability companies. By that authority, the Trustee is selling the bankruptcy estate's interest in said real properties upon approval of this Court.

3. The Debtor states in his Response and Opposition that he has filed a Motion to

Continue the hearing which according to the docket of this case, he has not.

4. Pursuant to a Motion to Sell (Docket 520), an Order was entered on April 1, 2024 (Docket 521) previously authorizing the Trustee to sell the real property located at **5209 Beaufort Avenue**, Baltimore, Maryland 21215 (hereinafter “Real Property”). It is unclear if this is the property the Debtor is referencing or not.

5. The sale of the real property at **5209 Beaufort Avenue** has settled and is complete.

WHEREFORE, the Trustee requests that the Court (1) denies the Debtor’s Response and Opposition to the Trustee’s Motion to Sell Real Property Located at **5209 Beaufort Avenue**, Baltimore, Maryland 21215; (2) and grant such other and further relief as it deems just.

Respectfully submitted,

**ROSE & ASSOCIATES, LLC**

/s/ Cheryl E. Rose  
Cheryl E. Rose, Chapter 7 Trustee, #05934  
9812 Falls Road, #114-334  
Potomac, MD 20854  
(301) 527-7789

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of April, 2024, copy of the foregoing Trustee's Reply to Debtor's Response and Opposition to the Trustee’s Motion to Sell Real Property Located at 5209 Beaufort Avenue, Baltimore, Maryland 21215 will be served electronically by the Court’s CM/ECF system on the following:

- **Glenna Elizabeth Barner** Glenna.Barner@maryland.gov
- **Leah Christina Freedman** bankruptcy@bww-law.com, leah.freedman@bww-law.com
- **Marie Louise Hagen** mlh@mlhagenlaw.com
- **Keith R. Havens** Keith.R.Havens@HavensLawFirm.com, Madeline.Reed@HavensLawFirm.com

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I HEREBY FURTHER CERTIFY that on this 26<sup>th</sup> day of April, 2024, a copy of the foregoing Trustee's Reply to Debtor's Response and Opposition to the Trustee's Motion to Sell Real Property Located at 5209 Beaufort Avenue, Baltimore, Maryland 21215 was mailed first class mail, postage prepaid to the following:

James H. Brandon  
16905 Germantown Road  
Germantown, MD 20874

Charles Martin  
5803 Lowery Lane  
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United States Marshals Service  
Attention: Mathew Silverman, Chief  
6500 Cherrywood Lane  
Greenbelt, MD 20770

Andrew A. Werner  
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/s/ Cheryl E. Rose  
Cheryl E. Rose, #05934